

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI,
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:15-CR-85 CWR-FKB

BRYAN JONES

SECOND MOTION TO CONTINUE

Defendant Bryan Jones respectfully moves the Court to continue his trial, previously scheduled for the court's next criminal calendar beginning March 1, 2016. In support of his motion, Mr. Jones states as follows:

1. In filing this Motion, Mr. Jones is waiving his right to a speedy trial.
2. Mr. Jones was indicted on October 6, 2015, for alleged violations of 18 U.S.C. § 1951(a), 18 U.S.C. § 924(c)(1), and 18 U.S.C. § 641.
3. Discovery includes extensive audio and video surveillance.
4. Additional time is needed to prepare for trial, including the studying of discovery and ongoing investigations on behalf of the Defendant.
5. Also, the parties have been engaged in negotiations that could lead to a conclusion of this matter, and additional time is needed to conclude those negotiations.
6. In continuing the trial date, Mr. Jones further requests that all other deadlines also be extended.
7. Assistant U.S. Attorney Mary Helen Wall does not oppose this motion.
8. This motion is being filed in good faith, to further the interests of justice, and with no intent to unduly delay these proceedings.

WHEREFORE, PREMISES CONSIDERED, Defendant Bryan Jones respectfully requests that this Court enter an order granting his motion to continue, re-setting the trial date and all related deadlines.

Dated: February 19, 2016.

Respectfully submitted on behalf of
BRYAN JONES

/s/ Drew M. Martin
Drew M. Martin, MSB 101045

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CERTIFICATE OF SERVICE

I certify that on the date indicated below I electronically filed the foregoing via the Court's CM/ECF system, which sent notification of the filing to all counsel of record.

/s/ Drew M. Martin

Dated: February 19, 2016.